

1 BARRY E. HINKLE, Bar No. 071223
2 PATRICIA A. DAVIS, Bar No. 179074
3 EZEKIEL D. CARDER, Bar No. 206537
WEINBERG, ROGER & ROSENFIELD, P.C.
1001 Marina Village Parkway, Suite 200
Alameda, California 94501
Telephone (510) 337-1001
Fax (510) 337-1023
E-Mail: bhinkle@unioncounsel.net
pdavis@unioncounsel.net
ecarder@unioncounsel.net

7 Attorneys for Plaintiffs

8 RICHARD N. HILL, Bar No. 083629
9 JOHN CHARLES POST, Bar No. 233236
LITTLER MENDELSON, P.C.
9 650 California Street, 20th Floor
San Francisco, California 94108-2693
10 Telephone 415.433.1940
Fax 415.399.8490
11 Email: rhill@littler.com
jpost@littler.com

12 Attorneys for Defendant

13 UNITED STATES DISTRICT COURT

14 NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION

16 THE BOARD OF TRUSTEES, in their capacities
17 as Trustees of the LABORERS HEALTH AND
WELFARE TRUST FUND FOR NORTHERN
18 CALIFORNIA; LABORERS VACATION-
HOLIDAY TRUST FUND FOR NORTHERN
19 CALIFORNIA; LABORERS PENSION TRUST
FUND FOR NORTHERN CALIFORNIA; and
20 LABORERS TRAINING AND RETRAINING
TRUST FUND FOR NORTHERN
21 CALIFORNIA,

22 No. C 11-3671 NC

23 Plaintiffs,

24 v.

25 BROWN & FESLER, INC., a California
26 Corporation,

27 Defendant.

JOINT STIPULATED REQUEST TO
CONTINUE CASE MANAGEMENT
CONFERENCE AND RELATED
DEADLINES; [PROPOSED] ORDER

1 Pursuant to Civil Local Rules 7-12 and 16-2, Plaintiffs and Defendant hereby respectfully
2 request that the Initial Case Management Conference scheduled for December 7, 2011, at 10:00
3 a.m. and related deadlines be continued for forty-five (45) days, or such date as determined by the
4 Court, to allow the Parties additional time to continue their discussions regarding a possible
5 resolution of this action without the necessity of further litigation, time and expense.

6 Plaintiffs and Defendant have been engaged in informal discussions and are requesting a
7 continuance of the Case Management Conference and related deadlines to allow the Parties
8 additional time for Plaintiffs to evaluate Defendant's settlement proposal. In addition, the Parties
9 are in the process of scheduling a settlement meeting to take place in the next several weeks. The
10 Parties have not requested a prior continuance of the Case Management Conference and related
11 deadlines.

12 The Parties expect that the requested extension of the date for the Initial Case
13 Management Conference will have no adverse effect on the schedule for the case. No trial date or
14 other deadlines have yet been set. The requested extension may facilitate the resolution of the
15 action. The continuance of the Case Management Conference would promote judicial efficiency
16 as the Parties are hopeful that the matter will be resolved at the upcoming settlement meeting.

17 Dated: November 30, 2011

18 WEINBERG, ROGER & ROSENFELD
19 A Professional Corporation

20 By: s/ Ezekiel Carder
21 EZEKIEL D. CARDER
Attorneys for Plaintiff

22 Dated: November 30, 2011

23 LITTLER MENDELSON

24 By: s/ John Post
25 RICHARD N. HILL
26 JOHN C. POST
Attorneys for Defendant

1 **[PROPOSED] ORDER**

2 Based upon the foregoing Stipulated Request to Continue Case Management Conference
3 and Related Deadlines, the Court orders the continuance of the Initial Case Management
4 Conference and related deadlines for forty-five (45) days.

5 Accordingly, the Case Management Conference will be held on February 1, 2012, at
6 10:00 a.m. in Courtroom A, 15th Floor, 450 Golden Gate Avenue, San Francisco, California.

7 **IT IS SO ORDERED.**

8 Date: 12-1-2011

9 
10 HONORABLE NATHANAEL COUSINS
11 UNITED STATES MAGISTRATE JUDGE

12 126261/646379

13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28